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Of Attorneys for Plaintiffs.

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

“LILY,” et al,

Plaintiffs,

v.

JAN ROUVEN FUECHTENER,

Defendant.

Case No: 2:19-cv-00352-RFB-EJY

DECLARATION OF MARGARET E.  
MABIE IN SUPPORT OF MOTION TO  
APPROVE MINOR SETTLEMENTS

HEARING DATE:  
TIME: 10:00 am

BEFORE HONORABLE MAGISTRATE  
JUDGE  
ELAYNA J. YOUCHAH  
UNITED STATES DISTRICT COURT

1 MARGARET E. MABIE hereby declares the following to be true and correct under  
2 penalty of perjury of the laws of the State of New York and under 28 U.S.C. §1746:

3 1. I am an attorney licensed in the state of New York.

4 2. I am employed by Marsh Law Firm, PLLC.

5 3. I represent the Plaintiffs “Jenny”, and “Andy,” related to their status as survivors  
6 of child pornography crimes. Although not of record, I have assisted with representation of  
7 them in this matter.

8 4. I make this declaration in support of the Motion for Approval of Minor  
9 Settlement in this case involving Defendant Jan Fuechtener (“Defendant” or “Fuechtener”).  
10

11 5. Both “Jenny” and “Andy” are above the age of majority.

12 6. I nonetheless make this declaration in support of the parties’ settlement of the  
13 claims herein and the terms of the parties’ proposed settlement agreement.

14 7. I approve of the terms of the parties’ proposed settlement agreement.

15 8. None of the clients advanced any money for costs. Marsh Law Firm, PLLC  
16 advanced the costs and expenses for this case.

17 9. The unfortunate truth is that for all of these young people there will likely be  
18 other lawsuits to file against the offenders who download their images and videos. This case is  
19 not the sole source of funds to aid in their attempts to cope with their injuries.  
20


21 10. The largest expense in this matter has been for retention and services of  
22 plaintiffs’ forensic expert for purposes of reviewing the digital evidence in this matter under 18  
23 U.S.C. §3509(m).  
24  
25

1           11.     The costs and expenses advanced by the Marsh Law Firm, PLLC for services of  
2 expert Kevin Laws related to this matter clients “Jenny” and “Andy,” and specifically their  
3 forensic review conducted by Plaintiff’s expert Kevin Laws were: \$892.

4           12.     I hereby declare under penalty of perjury under the laws of the United States of  
5 America that the foregoing is true and correct to the best of my knowledge.

6           13.     I respectfully ask the Court to approve the settlement of this matter along with  
7 the associated attorneys’ fees and expenses.  
8

9  
10 DATED: October 5, 2021

11  
12  
13 

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17 *Attorney for Plaintiffs Jenny, and Andy*  
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